

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

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**DAFINA ROTER VELYOV,**

**Plaintiff,**

**-vs-**

**Case No.: 2:14-cv-00071-RTR**

**FRONTIER AIRLINES, INC. and  
REPUBLIC AIRWAYS HOLDINGS INC.,**

**Defendant.**

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**DEFENDANTS' MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS**

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Defendants, Frontier Airlines, Inc., and Republic Airways Holdings Inc., by counsel, and pursuant to Fed. R. Civ. Proc. 12(c), respectfully request that this Court enter judgment for the Defendants on Plaintiff's Wisconsin Fair Employment Act inference, discrimination and retaliation claim ("WFEA claim") (leaving just her federal Family and Medical Leave Act claim) because the law does not provide Plaintiff with a private right of action for such a claim. The facts and legal arguments in support of this Motion are more fully set forth in Defendants' Memorandum in Support of Motion for Partial Judgment on the Pleadings filed contemporaneously herewith.

WHEREFORE, Defendants respectfully request that this Court enter judgment on the pleadings in their favor and against Plaintiff on Plaintiff's WFEA claim, and award all other necessary and proper relief.

Respectfully submitted,

s/ Paul C. Sweeney

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of June, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and forwarded a copy of the filing via United States, first-class mail, to the following:

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